

BROMBERG LAW OFFICE, P.C.

Brian L. Bromberg (Admitted in NY, NJ & CA)
Joshua Tarrant-Windt, Associate (Admitted in NY)

352 Rutland Road #1
Brooklyn, NY 11225
Phone: (212) 248-7906
Fax: (212) 248-7908

September 11, 2021

Via ECF

Honorable Philip M. Halpern, U.S.D.J.
Southern District of New York
300 Quarropas Street
White Plains, NY 10601-4150

Re: *Stephenson v Exclusive Motor-Sports, LLC, et al.*
SDNY Case No. 20-CV-01332 (PMH)

Dear Judge Halpern:

My office, together with co-counsel, represents the plaintiff, Dana Stephenson, in the above-referenced case. I am writing to Your Honor to advise the Court of the status of settlement discussions as directed in the Court's Order dated August 12, 2021.

On September 3, 2021, my co-counsel, Thomas R. Breeden, Esq., and I spoke with Matin Emouna, Esq. We asked whether he had spoken with his clients and whether the parties could settle the case. He responded that he had not spoken with his clients yet. Mr. Breeden and I asked him to get back to us as soon as possible, because we had a September 10th deadline to file a joint letter and with Labor Day and Rosh Hashanah taking up most of this week, we would be hard-pressed to get a joint letter on file. He said he would do his best to speak with the owners of the Exclusive Defendants and get back to us.

Unfortunately, neither Mr. Breeden nor I have heard back from Mr. Emouna, which is why I am filing this status letter without Mr. Emouna's input. Given that Mr. Emouna's clients are both in prison, that Labor Day and Rosh Hashanah fell this week, and that Yom Kippur and Sukkoth will soon be upon us, I respectfully request a three-week extension of the September 10th deadline set forth in the August 12th order.

Respectfully,

/s/ Brian Bromberg

Brian Bromberg

cc: All Counsel of Record (Via ECF)